

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

IN RE: Constance Erving Wade, Debtor

**Case No. 23-12312-SDM
CHAPTER 13**

MOTION TO SUSPEND PLAN PAYMENTS

COMES NOW, Debtor, by and through counsel, and moves this Court to suspend their Chapter 13 plan payments, and in support thereof, would show the Court as follows:

1. Debtor filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code.
2. Debtor's 2017 Dodge Challenger ("Vehicle") is in need of repair. The estimated cost for repairs is approximately \$3,977.33.
3. Debtor is requesting this Honorable Court to suspend any past due plan payments and one (1) month of plan payments, including any ongoing mortgage payments being paid through the plan, during the month of August 2025, so those funds will be available to pay for her needed Vehicle repairs.
4. Debtor wishes to resume making plan payments beginning in September 2025.
5. Debtor is requesting that her Chapter 13 plan payments be increased as necessary to compensate for the lost plan payments.

WHEREFORE, Debtor prays for an Order granting the above requested relief and any additional relief as may be just and proper.

Respectfully submitted

/s/ Thomas C. Rollins, Jr.

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CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., certify that an accurate copy of the Motion to Suspend Plan Payments was filed on CM/ECF this day and that the Chapter 13 Case Trustee and U.S. Trustee are registered to receive electronic notice in this case. The date of said notice is reflected on the Docket.

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.